Kingcome Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on the Timber Supply Review in the Kingcome Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Background

As part of the review of timber supply in the Kingcome Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Kingcome TSA *Data Package* and *Information Report* in June 2000. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Kingcome TSA. A 30-day review period, ending July 24, 2000, was provided for the public to comment on these documents.

On November 29, 2001, the British Columbia Forest Service released the *2001 Kingcome Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended January 28, 2002.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Kingcome TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Port McNeill Forest District office in Port McNeill.

Public Review Process and Response

Staff from the Port McNeill Forest District actively solicited public input on the Timber Supply Review in the Kingcome TSA through the following actions:

- in June, 2000, approximately 100 copies of the *Information Report* and 50 copies of the *Data Package* were mailed, e-mailed or distributed to stakeholders in the TSA, including First Nations, licensees, local governments and environmental groups. Meetings or presentations were offered.
- in November and December, 2001, approximately 125 copies of the *Timber Supply Analysis Report* and *Public Discussion Paper* were mailed or distributed to stakeholders in the TSA. Meetings or presentations were offered.
- additional copies of all four reports were available at the district office in Port McNeill and the Vancouver regional office in Nanaimo.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media. An interview was conducted with the local newspaper.
- referrals were made to the Ministry of Forests website where documents were available to download.

In addition, the following information sessions were held:

- July 10, 2000. Presentation to the Mount Waddington Community Resources Board. Ten attendees.
- July 19, 2000. Presentation to District of Port Hardy Council. Fifteen attendees.
- Aug. 15 and Sept. 19, 2000. Presentations to the Mount Waddington Regional District board. Ten attendees at each session.
- Dec. 11, 2001. Presentation to International Forest Products employees in Campbell River. Seventeen attendees.
- Dec. 14, 2001. Presentation in Port McNeill to local forest licensees. Five attendees.
- Dec. 6 and 13, 2001. Open houses in Port McNeill and Port Hardy. Two attendees.

The Port McNeill Forest District office

received nine written submissions on the *Data Package* and six submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Kingcome TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Operable Land Base
International Forest Products Ltd. (Interfor) notes that in the previous Timber Supply Review (TSR1), a 1993 operability assessment was used and the company states their desire to continue participating in the ongoing re-evaluation of operability limits. Interfor also says operability in the Klinaklini Supply Block should be reviewed given current economic conditions.

The Sierra Club of BC questions the definition of operability as "feasible to harvest from an economic or physical standpoint." The group questions how an area could be considered operable if only one of those factors applied, and suggests replacing "or" with "and."

Low Sites
Interfor says the exclusion of stands from the harvesting land base based on existing site index estimates that are known to be underestimated may remove economically operable types. The company recommends:

- assessing the impact on second growth if Old Growth Site Index (OGSI) adjustments are applied.
- not excluding any stands with logging history.
- comparing the criteria for defining low sites against recently harvested areas.

Environmentally Sensitive Areas (ESAs)
Interfor notes that a recreation features inventory is nearing completion and existing wildlife areas are under review, although neither process will be completed in time for this Timber Supply Review. However, the company says the results should be assessed as soon as they're available and if significant changes from old ESA mapping are evident, they could be incorporated as sensitivity analyses.

The Sierra Club expresses approval for reviewing ESA mapping for wildlife (Ew), saying that the restriction of Ew areas to deer and elk habitat is not adequate. They say the Ministry of Forests must anticipate the need for more Ew's to protect a wider variety of wildlife, and the timber supply analysis should also make allowances to replace Ew's that have been harvested.

With regard to ESAs for terrain stability, Interfor says the exclusion of Class IV areas could have a two to three percent negative impact on timber supply. They say a GIS exercise to correlate existing terrain assessments with specific slope classes is underway, and results will be extrapolated to other parts of the land base not covered by terrain stability overview assessments. Interfor says they want to review this analysis to evaluate operational reasonableness.

The Sierra Club says the chief forester's requirement for better terrain studies for this Timber Supply Review has not been fulfilled. The group recommends a conservative approach, saying Class V terrain should trigger a 100 percent netdown and expressing the opinion that a 20 percent netdown for Class IV is inadequate.

An individual submission notes that funding was not available for an analysis of unstable slope terrain in the TSA, and says the questionable methodology used in the analysis leaves the public exposed to remediation and compensation costs resulting from harvesting in unsuitable areas. This individual says this can be seen as a public subsidy to the forest sector.

Roads, Trails and Landings (RTLs)
Interfor says the deduction for RTLs should be decreased due to increased heli-logging and road deactivation.

Forest Inventory
Interfor says the 1995 inventory audit indicates the forest inventory overestimates standing inventory by 18 percent in the operable land base, affecting short- and medium-term timber supply. The company says that until Vegetation Resources Inventory (VRI) data is integrated into the inventory, at least an evaluation of the reliability of the results should be completed.

The Sierra Club says Table 1 of the *Data Package* indicates that the standing volume of mature timber in the northern 30 percent of the TSA is still overestimated; the status of the southern 70 percent where Phase 1 of the VRI was completed is unclear. The group urges the use of conservative estimates, saying it's better in the long term for both the ecology and the economy to have too much mature forest rather than too little.

Expected Rate of Growth
Interfor recommends maximizing the use of OGSI factors where appropriate, as this will provide increased yields, faster green-up rates and lower minimum harvestable ages (MHAs).

Interfor says tree improvement programs represent current practice so estimates of productivity gains should be used in the base case. The company says long-term gains could be in the order of three to four percent; short-term gains can result if green-up ages and MHAs are limiting timber supply.

Minimum Harvestable Age
Interfor says the MHAs used in the base case should be based on yields that include OGSI adjustments and genetic gains. The company also says an analysis should be done to determine at what age 95 percent of maximum annual growth occurs in second-growth stands, versus the age being used in operational harvesting plans.

The Sierra Club says the *Data Package* specifies minimum ages for harvest that will undermine BC's competitive advantage – the ability to produce valuable, large timber. They say the short rotation approach is bad for both the ecology and the economy.

Regeneration and Silvicultural Systems
Interfor says the assumption of a four- to five-year regeneration delay likely reflects delays in reporting rather than the actual regeneration delay in the field. The company says they reviewed records from 87 blocks and established the average delay as one to three years (for 74 percent of the blocks).

Interfor also notes that a mitigation strategy for Known Scenic Areas is to reforest within two years, and says this should be modeled.

The Sierra Club says the statement that 75 percent of the harvested area will be clearcut with reserves does not provide sufficient information, and they ask for more information on the retention levels in those reserves. The group notes that forest industry initiatives to employ more publicly acceptable silvicultural systems should be considered in the analysis, as these systems will create a downward pressure on timber supply.

An individual says that alternative harvesting systems, including single tree selection, are required on a significantly larger portion of the landscape in order to not negatively impact tourism/recreation desirability.

Green-up Requirements
The Sierra Club says that although the *Data Package* indicates that natural regeneration means a green-up delay, it is also usually more ecologically appropriate, sustaining soils and genetic diversity. If weaker green-up standards will be used to increase the AAC, this should be made explicit, according to the Sierra Club.

Visual Quality
Interfor says that in general the objective has been to reduce the impact of visual quality objectives (VQOs) on timber supply and therefore the upper limits of the allowable ranges of VQOs should be used. The company says this is reasonable, given all the downward pressures affecting timber supply.

The Regional District of Mount Waddington asks to know the number of hectares of forest land removed from the land base due to VQO designations. The regional district says it's important to know the economic loss to the forest industry if land is protected from logging because of its visual quality to cruise ships transiting the area.

The Sierra Club asks if the public, particularly tourism and recreation interests, were involved in the designation of "known" scenic areas. The group requests details on the "known" areas and also those excluded from the list.

Recreation and Cultural Factors
The Sierra Club says the fact that a digital version of a completed recreation features inventory is not available is not an adequate reason to not use the information contained in the inventory.

The Sierra Club expresses surprise that although the TSA possesses significant archaeological and cultural heritage values, no netdown from the land base will be applied. The group questions if First Nations have been asked if they're satisfied that the existing inventories capture their cultural resources for Timber Supply Review purposes.

Riparian Management
The Sierra Club says riparian inventories are not mentioned but are needed at a finer scale than current forest cover mapping in order to capture recommended management for smaller streams. The group says the timber supply analysis should anticipate increases in riparian management (beyond Forest Practices Code requirements) due to demands for improved management of small streams. The Sierra Club says problems with misclassification may also mean that the 1995 study used to model riparian management underestimated reserves.

Interfor says given the large impact of riparian reductions, an independent review or further analysis of assumptions is needed. The company reports on a review that they conducted of harvested blocks, and concludes the riparian reductions should be much lower than the *Data Package* assumes.

An individual notes the effect of absorption and trickle rates in old-growth forests, and says that harvesting, even with a riparian zone, greatly increases the volume of water and sediment entering streams, thereby affecting fish.

Watershed Management
The Sierra Club says the analysis should anticipate that there will be more community watershed designations as citizens realize that community watersheds receive greater protection under the Forest Practices Code.

Biodiversity and Wildlife
Interfor says area reductions for Wildlife Tree Patches (WTPs) are based on meeting 75 percent of WTP requirements outside the timber harvesting land base. The company says it's their experience that a greater proportion than that comes from outside the harvesting land base, and this could be demonstrated through a spatial analysis of this assumption.

Interfor notes that the base case will incorporate variable retention harvesting on 25 percent of the land base with the assumption that retained volumes do not contribute to landscape level biodiversity. The company also says that until the final landscape unit boundaries and biodiversity emphasis options are determined, these negative-influencing assumptions should not be modeled.

The Sierra Club says the Identified Wildlife Management Strategy is well underway and the government policy that it will have an impact of one percent during the next five years should be accounted for in this timber supply analysis. In general, the group notes that data on wildlife habitat is grossly inadequate for forest management.

An individual submission expresses concern about endangered and at-risk species, and questions whether there is sufficient knowledge about the needs of these species to enable harvesting to occur without disrupting or dislocating them. This individual asks for an example of an area that has been logged and still has a thriving grizzly bear population, and also questions how changes to the Forest Practices Code will affect species diversity.

Land-Use Planning
The Sierra Club says that although the Central Coast Land and Resource Management Plan (CCLRMP) is not completed, the Timber Supply Review should anticipate and plan for the results of this process. Otherwise, the group says, harvesting pressures may be created in certain areas as a result of protected areas or other decisions.

The Sierra Club asks how the Vancouver Island Land Use Plan is dealt with, and notes that they, along with many tourism and recreation interests, reject this plan and its Higher Level Plan order. The group says the Timber Supply Review should not assume the plan will be legislated as is.

Socio-Economic Factors
An individual questions how other values besides forestry were assessed, saying this is important due to the rapidly rising economic impact of tourism on Vancouver Island. This individual asks how the value and impact of tourism have been calculated, while expressing the opinion that it has been substantially excluded from consideration. There is a need to diversify economics from a major reliance on just one industry, according to this submission, yet the analysis does not indicate any assessments in this regard and what options might exist. This individual requests an independent review of the assumptions in the analysis.

Timber Supply Area Analysis Report

Operable Land Base
The Goletas Forestry Consulting Group provides updated operable area maps for the East Creek watershed and the Goletas Forest Licence area. They express the belief that the operable land base in the *Analysis Report* is too conservative and does not reflect actual harvest areas available.

Low Sites
Mill & Timber Products Ltd. provides an estimate of the total area of potential development on low sites within their operating areas. The company notes this information refers to proposed development only, and in reality the numbers are likely high due to economic feasibility and various constraints (e.g., operability, visuals). While the numbers show the company has about 6.5 years of harvest left on their licence, the actual number is probably closer to three to four years, according to this submission.

Regeneration and Silvicultural Systems
The Goletas Group says regeneration delay should be around two years, since most planting occurs within two years of harvest but may not be reported for another year or two until a formal survey is completed.

The Goletas Group requests a sensitivity analysis on enhancing silviculture practices (such as fertilization), saying if the analysis shows significant increases in future volumes, it may be worthwhile to increase silvicultural activities.

Riparian Management
The Natural Resources Defense Council (NRDC) expresses the opinion that insufficient netdowns were made for riparian areas due to the use of the inadequate riparian provisions of the Forest Practices Code. According to NRDC, the federal Department of Fisheries and Oceans (DFO) made clear to the BC Forest Service in February, 2000, that the riparian protection given to small fish-bearing streams and their tributaries is inadequate. The NRDC says DFO invoked the federal *Fisheries Act* to request specific protections for these streams (details provided).

Wildlife Management
The Sierra Club says that although Wildlife Habitat Areas have not yet been established, the Identified Wildlife Management Strategy policy is in place and the analysis should therefore model at least a one percent reduction in the timber harvesting land base to account for species at risk.

Biodiversity
The Sierra Club expresses the belief that the policy of converting all "natural" stands in the timber harvesting land base (THLB) to "managed" stands within the next 100 years will disqualify timber extracted under this policy from eco-certified markets. The group says the assumption that biodiversity and recreation needs can be met almost entirely outside the THLB may also not be consistent with certification standards. This submission notes that some critical habitat needs and biodiversity functions are closely associated with the most productive forest areas and eco-certification standards will likely demand that biodiversity reserves be placed where they are needed (often overlapping with the THLB).

Land-Use Planning
The Sierra Club says the planned timber harvest for this TSA is inconsistent with the definition of ecosystem-based management contained in the Framework Agreement of the CCLRMP, due to the explicit plan to alter the structure and age composition of the most productive portions of the forest.

Alternative Rates of Harvest
The Sierra Club makes several points relating to alternative harvest rates and the related socio-economic effects:

- no analysis was done of the costs faced by government (for watershed restoration, water purification, etc.) under current harvest levels.
- no modeling of an alternative rate of harvest was done to show how provincial revenue will be affected over time by the declining quality of the timber resource, the loss of access to the certified wood market, or the reduced opportunities for non-timber sectors to generate revenue.
- there's no exploration of a harvest rate that would slow the consumption of original old-growth forests, or plan for a long-term harvest of old timber, to provide quality wood for the value-added sector. Wood quality is given insufficient attention in the analysis.
- BC's competitive advantage lies in high-quality, premium timber grown on long rotations and in BC's exceptional craftspeople, as well as world-class wilderness experiences, biodiversity and other forest ecosystem services.

Socio-Economic Factors
An individual submission says over the last 50 years he has witnessed a severe decline in the quality of the red and yellow cedar that woodworkers rely on for traditional value-added enterprises. He says the best old growth is long gone and the rest has been high-graded,

and maintains this constitutes theft from future generations of the opportunity to create economic wealth from traditional crafts based on quality wood, as well as a theft from unceded territories of First Nations. This individual says tourism, recreation and non-timber uses must be better accommodated, now that the primary resource liquidation-dependency has been recognized as unwise.

Minister's Letter to Chief Forester
The Sierra Club asserts that the "sustainability" referred to in the letter is not equivalent to the sustained yield of timber, and therefore a long-term perspective not limited to the benefits of timber production should be taken. Noting other government objectives regarding forest management, the Sierra Club says it would be in line with the Crown's social and economic objectives to reduce the rate of harvesting.

In addition, the Sierra Club says the Minister of Forests directed the chief forester to consider local objectives where these are consistent with provincial objectives. In their opinion, if local objectives are consistent with long-term sustainability, they should be considered. However, objectives inconsistent with sustainability do not fit the parameters set for forest management and should be given little weight, according to the Sierra Club.

Other Comments

Many submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process
Interfor says there's a significant disconnect between timber supply analysis and the operational ability to achieve the determined AAC, not due to a lack of timber but due to time-based issues such as access to available second-growth stands, green-up for visuals and adjacency, and micro-level rates of cut. The company says this disconnect is not adequately reflected in the timber supply analysis, and requests further analysis and information as follows:

- test the impact of giving priority to harvesting second-growth stands rather than old-growth stands.
- test the impact of modeling green-up on a two-pass harvest system rather than three- and four-pass.
- develop information regarding the timber flow over time by landscape unit, to address macro-level analysis vs. micro-level implementation.

Interfor also says mapping of site index and biogeoclimatic ecosystem classification units must be completed for the entire TSA before the next Timber Supply Review. The company says this information could affect estimates of available volumes (as current research indicates that regenerated strands are outperforming expectations in most cases) as well as assumptions for harvest ages, green-up ages and biodiversity.

The Sierra Club makes a range of comments on the Timber Supply Review process, as well as recommending additional analyses that should be undertaken. Their comments include the following:

- several forest management considerations are not identified, such as treaty negotiations, endangered species provisions and market pressures for certified wood. These changes should be anticipated in the next five-year period.
- inventories have not been specified for important forest values that may impact the timber harvesting land base. In particular, data regarding wildlife habitat is grossly inadequate.
- research results are not treated consistently. For example, very little substantiated research is necessary to drive a "positive influence" on timber supply yet studies on endangered species habitat requirements do not produce a similar "negative influence."

- the precautionary principle should be used to estimate the land base available for sustainable commercial harvest. Otherwise there will be undue pressure on land managers to compromise other forest values.

The Sierra Club also comments extensively on deficiencies in the socio-economic analysis. The group refers to relevant sections of the *Forest Act* and the *Ministry of Forests Act*, and asserts that the analysis will not provide the information the chief forester needs to comply with those sections. The Sierra Club identifies many gaps in socio-economic information, including the following:

- full consideration of benefits and costs, including costs of environmental degradation, forest industry subsidies, depletion of natural capital, consequences for First Nations, and loss of opportunity for other sectors.
- how the net social and economic benefits (both immediate and long-term) derived from the forest vary with the AAC. Benefits must be much broader than timber flows and the number of forest industry jobs.
- issues surrounding timber quality, the requirements of the certified wood market, and the needs of the value-added industry.
- the implications of various AACs on environmental quality, biodiversity, First Nations, other economic sectors and flows of non-timber forest products.
- how the Crown's financial interest changes as high-value stands are liquidated and replaced by low-volume and low-value second-growth stands.

The Sierra Club expresses concern that current management assumptions imply a continuation of a high rate of harvest that generates many costs not factored into the analysis, and these costs will gradually erode BC's social and economic welfare. In addition, the group says many issues that relate to First Nations' concerns must be addressed.

Alder Management Practices

Coast Mountain Hardwoods notes the lack of any apparent alder management strategy, despite the existence of their alder licence. The company says the policy that limits the planting of alder to 20 hectares per year must be reviewed, and expresses the belief that 60 percent of areas logged under their licence should be planted to alder. The company makes the following points:

- the question of plantation survival and the success of the alder industry are no longer a matter of supposition. Worldwide demand for alder is growing annually.
- the Vancouver Region's stocking standards recognize that alder can be a preferred management option on certain sites. This must be recognized in the Kingcome Timber Supply Review.

Harvest Levels and Partitions

Coast Mountain Hardwoods says that after the last Timber Supply Review the chief forester said the discrepancies between the studies performed by the BC Forest Service and by the licensee to examine the alder supply should be reconciled prior to the next AAC determination. This has not been done, according to the company, and they request a meeting to discuss a compromise that would form the basis for the apportionment that will follow this Timber Supply Review. Coast Mountain says the AAC for their alder forest licence should be between 27,000 and 44,000 cubic metres.

The Regional District of Mount Waddington expresses concern about the potential socio-economic impacts of a reduced AAC.

Interfor says the base case forecast of an initial harvest level that is 5.7 percent less than the current AAC is significantly lower than preliminary indications suggested. They request a clarification of the factors that contributed to the reduced base case harvest level.

An individual says the current AAC is unsustainable at nearly 50 percent above the long-term harvest level by volume and immeasurably more by value, and says it must be reduced to a realistically-sustainable level immediately. This individual also suggests a partition for cedar (similar to the one for red alder), and says that without this, cedar will continue to be targeted for the greatest immediate profits while the full-profile utilization of hemlock is avoided.

The Sierra Club expresses concern that the timber supply scenarios involve a rate of harvest that will be to the province's social and economic disadvantage, will not protect the Crown's financial interests, and will involve unacceptable levels of ecological risk. The group's reasons include the following:

- wood will be excluded from eco-certification (due to, for example, the old-growth conversion policy).
- opportunities will be reduced for non-timber sectors and for the value-added sector (because they rely on old-growth wood).
- unacceptable costs will be imposed on First Nations, exposing the Crown to potential liability for compensation.
- the lack of an allowance for the Identified Wildlife Management Strategy.
- by setting an AAC that encourages logging at or beyond the total economic margin (if the full costs of logging were calculated, including social and environmental costs), the province experiences a net economic loss.

The Sierra Club says a competing demands study should be undertaken to address the benefits and costs of projected harvest levels and to assist in identifying a harvest level that maximizes the net social and economic benefits to the province.

Appendix 1

Submissions received by the Port McNeill Forest District

Submissions received on the Data Package

Local government
Regional District of Mount Waddington (two submissions)

Forest industry
International Forest Products Ltd. (three submissions)
Coast Mountain Hardwoods Ltd.

Interest groups
Sierra Club of BC

General public
Two individual submissions

Submissions received on the Timber Supply Analysis Report

Forest industry
International Forest Products Ltd.
Goletas Forestry Consulting Group Ltd.
Mill & Timber Products Ltd.

Interest groups
Natural Resources Defense Council
Sierra Club of BC

General public
One individual submission